

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

ERIC CHENG (CABN 274118)  
AJAY KRISHNAMURTHY (CABN 305533)  
ALETHEA M. SARGENT (CABN 288222)  
Assistant United States Attorneys

1301 Clay Street, Suite 340S  
Oakland, California 94612  
Telephone: (510) 637-3680  
FAX: (510) 637-3724  
eric.cheng@usdoj.gov  
ajay.krishnamurthy@usdoj.gov  
alethea.sargent@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	<b>CASE NO. 4:23-cr-00267 JSW</b>
	)	
Plaintiff,	)	<b>JOINT STATUS REPORT</b>
	)	
v.	)	
	)	
TIMOTHY ALLEN MANLY WILLIAMS,	)	
	)	
Defendant.	)	

This matter is set for hearing on November 28, 2023, and the Court has ordered the parties to submit a joint status report by November 21, 2023. Dkt. 35. The parties hereby respectfully submit this joint status report.

On August 16, 2023, a federal grand jury returned an indictment charging the Defendant with violations of 18 U.S.C. § 1512(c)(2), obstruction of official proceedings, 18 U.S.C. § 1519, destruction, alteration, and falsification of records in federal investigations, and 18 U.S.C. § 242, deprivation of rights under color of law. The Defendant is represented in these proceedings by the undersigned counsel.

1 In September, the United States produced a first tranche of discovery, which was described in the  
2 parties' prior joint status report. In November, the United States produced its second tranche of  
3 discovery. That discovery comprises 65.2 GB in data, specifically the seized (pertinent) data from all  
4 mobile devices searched in the federal investigation.

5 More discovery remains to be produced, and the government will continue to do so on a rolling  
6 basis. The government is optimistic that by the end of December discovery will be substantially  
7 complete.

8  
9 DATED: November 20, 2023

Respectfully submitted,

10 ISMAIL J. RAMSEY  
11 United States Attorney

12 /s/  
13 ERIC CHENG  
14 AJAY KRISHNAMURTHY  
15 ALETHEA SARGENT  
16 Assistant United States Attorneys

17 /s/  
18 RANDY SUE POLLOCK  
19 Counsel for Defendant TIMOTHY ALLEN  
20 MANLY WILLIAMS  
21  
22  
23  
24  
25  
26  
27  
28